

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF VERMONT**

In re:

RANDI LEE TAYLOR,

Debtor.

Bankr. Case No.: 23-10055

Chapter 13

RANDI LEE TAYLOR,

Plaintiff,

Adv. Proc. No.: 23-01003

v.

NAVIENT SOLUTIONS, INC.,

Defendant.

**NAVIENT SOLUTIONS, LLC’S ANSWER TO DEBTOR’S COMPLAINT TO
DETERMINE PRIVATE STUDENT LOANS DISCHARGED FOR “UNDUE
HARDSHIP” UNDER 11 U.S.C. § 523(a)(8)**

Navient Solutions, LLC (“NSL”), f/k/a Navient Solutions, Inc., by and through its undersigned counsel, hereby provides its Answer to the allegations of Plaintiff, Randi Lee Taylor (“Plaintiff”)’s Debtor’s Complaint to Determine Private Student Loans Discharged for “Undue Hardship” under 11 U.S.C. § 523(a)(8) (“Complaint”), and states as follows:

Nature of Action

1. Admitted as to the nature of this proceeding only.

Jurisdiction and Venue

2. Admitted.
3. The Plaintiff filed a Motion to Transfer on January 27, 2023. Otherwise admitted.

4.- 6. Admitted.

Parties

7. Admitted only that the Plaintiff is indebted to NSL on three (3) educational loans, with an aggregate balance, including principal and interest, of approximately \$104,059.66 as of the filing of the instant adversary proceeding. As to the balance of the averments contained within this paragraph of Plaintiff's Complaint, NSL is without information or knowledge sufficient to form a belief as to the truth of the averments contained within this paragraph of Plaintiff's Complaint and, therefore, denies same.

8. Admitted only that Defendant, Navient Solutions, LLC, f/k/a Navient Solutions, Inc., is a Delaware limited liability company and is the holder of three (3) educational loans on which the Plaintiff is liable.

Factual Allegations

9. Admitted only that the Plaintiff is indebted to NSL on three (3) educational loans as identified in paragraph 7, above.

10. – 21. At this time, NSL is without information or knowledge sufficient to form a belief as to the truth of the averments contained within these paragraphs of Plaintiff's Complaint and, therefore, denies same.

22. This paragraph of Plaintiff's Complaint is a conclusion of law, to which no response is required, but in an abundance of caution, is denied.

Claim for Relief

23. No response.

24. – 25. These paragraphs of Plaintiff's Complaint are conclusions of law and/or requests for relief, to which no response is required, but in an abundance of caution, are denied.

WHEREFORE, Navient Solutions, LLC respectfully requests judgment in its favor and against Plaintiff and such other relief as is just and equitable.

Respectfully submitted,

By: /s/ John J. Kennelly
John J. Kennelly, Esquire
PRATT, VREELAND, KENNELLY, MARTIN
& WHITE, LTD.
P.O. Box 280
Rutland, VT 05702-0280
Telephone: (802) 775-7141
Facsimile: (802) 775-6483
E-mail: kennelly@vermontcounsel.com
Attorneys for Navient Solutions, LLC

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF VERMONT**

In re:

RANDI LEE TAYLOR,

Debtor.

Bankr. Case No.: 23-10055

Chapter 13

RANDI LEE TAYLOR,

Plaintiff,

Adv. Proc. No.: 23-01003

v.

NAVIENT SOLUTIONS, INC.,

Defendant.

CERTIFICATE OF SERVICE

I, John J. Kennelly, Esq., a member of the firm of Pratt Vreeland Kennelly Martin & White, Ltd., counsel for Navient Solutions, LLC, hereby certify that Navient Solutions, LLC's Answer to Plaintiff's Complaint filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of the Electronic Filing (NEF) generated in connection with these documents.

Dated at Rutland, Vermont, this 11th day of May, 2023.

By: /s/ John J. Kennelly
John J. Kennelly, Esquire
PRATT, VREELAND, KENNELLY, MARTIN
& WHITE, LTD.
P.O. Box 280
Rutland, VT 05702-0280
Telephone: (802) 775-7141
Facsimile: (802) 775-6483
E-mail: kennelly@vermontcounsel.com
Attorneys for Navient Solutions, LLC